

Exhibit 28

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Subject: Valsartan MDL - Defendants' Objections to Plaintiffs' Document Requests
Date: Tuesday, November 5, 2019 11:13:46 AM

Behram:

During our meet and confer yesterday regarding the macro discovery issues, Plaintiffs proposed that the Manufacturing Defendants should agree to amend their objections to Plaintiffs' document requests in light of Plaintiffs' assertion that the Manufacturing Defendants have asserted "boilerplate" objections in response to each document request. The Manufacturing Defendants disagree with that characterization, as many of their objections are explicitly tied to the drug at issue and the alleged impurities, manufacturing processes, and injuries at issue, and because many of the objections are subject to the resolution of macro discovery issues. Nevertheless, the Manufacturing Defendants will be amending their objections to the document requests, and intend to provide Plaintiffs with an amended set of objections on or before November 13.

Regards,
Seth



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